

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

**UNITED STATES OF AMERICA,
Plaintiffs**

Vs.

**DANIELLE BERTOTHY
Defendant**

CRIM CASE 25-0021 (GMM)

MOTION REQUESTING CONTINUANCE OF STATUS CONFERENCE

COMES NOW Danielle Bertothy, and through undersigned pro-hac-vice counsel, respectfully alleges and prays:

- 1)** The Court has scheduled a status conference for next Monday, March 10.
- 2)** Although we are pro-hac-vice counsel in the case at bar, lead counsel has asked us to substitute them on the status conference.
- 3)** However, we have previous commitments which make it impossible to be at the scheduled status conference.
- 4)** We are scheduled to appear with your Honor next Monday, March 17 at 9am in the case of US v. Norberto Martínez, 24-188 (GMM).
- 5)** We respectfully request the Court to continue the status conference in the case at bar for next Monday, March 17.

WHEREFORE it is respectfully requested from this Court to grant the requested continuance and schedule the status conference for next

Monday, March 17.

RESPECTFULLY SUBMITTED.

I HEREBY CERTIFY that a true and exact copy of this document has been filed through the Court's ECF/ECM which will send notification of this filing to all parties of record.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this March 6, 2025.

S/ *Jennie Mariel Espada, ESQ.*

USDC 225003

PO BOX 13811,

SJ, PR, 00908

787-758-1999/787-633-7199

espada.esquire@gmail.com